

July 19, 2005

Mike and Robert,

While the PBT rule is primarily concerned with phasing out sources of PBTs the goal is to reduce total exposure to these toxic compounds in a timely and efficient manner. The risks from exposure to house dust are high and the cost of control is low. House dust is one of the main routes of exposure top many PBTs some of which are not on your list. The deep dust in an older carpet is probably the largest reservoirs and source of exposure to PBTs in houses where people spend most of their time. I mention these facts because the costs of control of PBTs are one of the important considerations in reducing total exposure and listing PBTs for phase out. We hope that you work closely with Washington State Dept. of Health in this pioneering effort reduce exposure and health costs as well as allowing our children to reach their full potential.

I will be sending studies related to the observations made above.

Thanks for the opportunity to comment on the PBT rule.

John Roberts  
818 207th AVE NE  
Sammamish, WA 98074  
425-868-9439  
fax 425-868-8470  
engrplus@worldnet.att.net